

# Sage Legal LLC

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June 13, 2024

**VIA ECF**

United States District Court  
Eastern District of New York  
Attn: Hon. Pamela K. Chen, U.S.D.J.  
225 Cadman Plaza East  
Courtroom 4F North  
Brooklyn, NY 11201-1804

**Re: IME WatchDog, Inc. v. Gelardi, *et al.***  
**Case No.: 1:22-cv-1032 (PKC) (JRC)**

Dear Judge Chen:

This office, together with Milman Labuda Law Group PLLC, represents the Plaintiff IME WatchDog, Inc. (“Plaintiff”) in the above-referenced case.

In light of the irrefutable evidence provided to this Court that IME Legal Reps is a successor to IME Companions owned and operated by Defendants, and that non-party Eugene Liddie (“Liddie”) is an agent and mere instrumentality of the Defendants (who, consequently, falls within the ambit of the March 27, 2023 expanded preliminary injunction), Plaintiff writes to respectfully request that the Court issue a temporary restraining Order to enjoin IME Legal Reps and Liddie from serving customers on the Enjoined Customers List pending hearing and determination of Plaintiff’s Order to show cause.

Every day that goes by with Defendants and Liddie continuing to operate IME Legal Reps in violation of this Court’s Orders is causing further irreparable harm to the Plaintiff, and neither the Defendants nor Liddie should benefit from the delay caused by their doing.

Plaintiff thanks this Court for its continued time and attention to this case.

Dated: Jamaica, New York  
June 13, 2024

Respectfully submitted,

**MILMAN LABUDA LAW GROUP PLLC**

/s/ Jamie S. Felsen, Esq.

**SAGE LEGAL LLC**

/s/ Emanuel Kataev, Esq.

cc: all counsel of record